

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
PUBLIC SAFETY AND HOMELAND SECURITY BUREAU**

In the Matter of	)	
	)	
Public Safety and Homeland Security Bureau	)	PS Docket No. 11-60
Seeks Comment on Improving Wireless Network	)	
Resiliency Through Encouraging Coordination	)	
With Power Companies	)	
	)	

**REPLY COMMENTS OF AMERICAN ELECTRIC POWER SERVICE  
CORPORATION AND SOUTHERN COMPANY SERVICES, INC.  
IN RESPONSE TO JANUARY 3, 2019 PUBLIC NOTICE**

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**BEFORE THE  
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American Electric Power Service Corporation (“AEP”) and Southern Company Services, Inc. (“Southern”) respectfully submit these reply comments in response to the Commission’s January 3, 2019 Public Notice in the above referenced docket.<sup>1</sup>

**I. MOST COMMENTERS AGREE THAT THE BEST FORUM FOR IMPROVED COORDINATION BETWEEN COMMUNICATIONS PROVIDERS AND POWER COMPANIES IS AT THE LOCAL EMERGENCY OPERATIONS CENTER LEVEL.**

AEP and Southern, in their initial comments, stated: “The best forums for purposes of disaster coordination and planning are the state and local emergency operations centers (EOCs).”<sup>2</sup> The communications providers that commented on this issue seemed to agree. For example, CTIA said that “on-the-ground coordination with local power companies” is a “particularly important

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<sup>1</sup> Public Notice, *Public Safety and Homeland Security Bureau Seeks Comment on Improving Wireless Network Resiliency Through Encouraging Coordination with Power Companies*, DA 19-13, PS Docket No. 11-60 (rel. Jan. 3, 2019) (“Public Notice”).

<sup>2</sup> See Initial Comments of American Electric Power Service Corporation and Southern Company Services, Inc. (“Initial Comments”) (Feb, 8, 2019) at 6.

resiliency practice” that is “often led by state or local emergency operations centers.”<sup>3</sup> AT&T echoed this sentiment: “Coordination between AT&T and its power utility counterparts occurs primarily through AT&T’s emergency management processes and at the local level through interaction with the state and/or local EOCs.”<sup>4</sup> The Competitive Carriers Association similarly stated that “coordinated communication could occur at state and local emergency operations centers (‘EOCs’).”<sup>5</sup> In addition, T-Mobile stated that “on-the-ground coordination with electric companies . . . often occurs in collaborative meetings at the state and local levels.”<sup>6</sup> T-Mobile’s comments even illustrate how its participation and coordination at the local level during the Camp Wildfires allowed it to “design a dynamic response for its technical teams that was focused and efficient” and was thus “able to deploy temporary resources in areas subject to longer timelines for the restoration of power.”<sup>7</sup>

As AEP and Southern explained in their initial comments, the EOCs are where “key decisions are made regarding restoration priorities and objectives” and where “key information is shared regarding progress and problems.”<sup>8</sup> Those commenters that ignore the criticality of EOC level participation are either (a) unaware of their opportunity to participate at the EOC level or (b) under the impression that power companies should affirmatively contact them, rather than vice versa. For example, the American Cable Association (“ACA”) argues: “[Power] companies should further be encouraged to solicit and accept input from communications providers about their customers that need priority restoration....”<sup>9</sup> This is exactly backwards. **Communications**

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<sup>3</sup> Comments of CTIA (“CTIA Comments”) (Feb. 8, 2019) at 5-6.

<sup>4</sup> Comments of AT&T (“AT&T Comments”) (Feb. 8, 2019) at 4.

<sup>5</sup> Comments of Competitive Carriers Association (“CCA Comments”) (Feb. 8, 2019) at 6.

<sup>6</sup> Comments of T-Mobile USA, Inc. (“T-Mobile Comments”) (Feb. 8, 2019) at 6.

<sup>7</sup> T-Mobile Comments at 6.

<sup>8</sup> Initial Comments at 7.

<sup>9</sup> Comments of American Cable Association (“ACA Comments”) (Feb. 8, 2019) at 12.

**providers should come to the EOC and provide this information**, rather than sitting back and expecting power companies—during the duress of disaster response—to gently solicit this information. As AEP and Southern stated in their initial comments, if communications providers want to be “in the loop” with respect to disaster planning and response, they need “boots on the ground” at the EOCs.

## **II. WIRELESS CARRIERS CONTINUE TO PUSH BACK ON THE IMPORTANCE OF BACK-UP POWER AS A KEY ELEMENT OF NETWORK RESILIENCY.**

AEP and Southern, in their initial comments, noted that wireless carriers should consider back-up power to improve resiliency of their networks and to avoid outages following natural disasters.<sup>10</sup> AEP and Southern, both of which maintain their own communications systems for purposes of internal communications, use “back-up generation at critical sites so that a power outage at a single site, or delayed restoration of electric service to that site, does not disrupt the operability of the network.”<sup>11</sup> Wireless carriers, though, appear to generally disagree with the importance or practicality of back-up power at key sites. T-Mobile, for example, claims that limited resources, investment prudence and space limitations make back-up power at key sites impractical.<sup>12</sup> But if the “unavailability of commercial power” is (as alleged by T-Mobile) the main cause of network outages after a disaster,<sup>13</sup> it stands to reason that the network should be designed in such a way to allow back-up power to mitigate this circumstance.

T-Mobile also states: “The effectiveness of generator deployment could be significantly improved, however, if T-Mobile knew where power companies planned on restoring service

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<sup>10</sup> Initial Comments at 2-5.

<sup>11</sup> Initial Comments at 3.

<sup>12</sup> T-Mobile Comments at 9.

<sup>13</sup> T-Mobile Comments at 5.

first.”<sup>14</sup> AEP and Southern agree that this type of information is important for all electric customers. As AEP and Southern explained in their initial comments:

Both AEP and Southern post information and updates to their respective websites that identify where there are outages and when electric service is expected to be restored in those areas.... This information should enable communications providers to make informed decisions regarding the need for fueling back-up generation and other stop-gap measures until commercial power is restored.<sup>15</sup>

To be clear, AEP and Southern are not advocating for prescriptive back-up power requirements. AEP and Southern generally agree that a carrier (or a utility for that matter) is in the best position to make strategic decisions regarding the resiliency of its network infrastructure.<sup>16</sup> AEP and Southern do believe, though, that this flexibility should be exercised prudently and, that this same type of flexibility should be afforded to electric utilities when it comes to managing their own infrastructure, including but not limited to infrastructure access processes (i.e. pole attachments).<sup>17</sup>

**III. MOST COMMENTERS AGREE THAT THE COMMISSION NEED NOT TAKE ANY SPECIFIC ACTION WITH RESPECT TO IMPROVING COORDINATION EFFORTS BETWEEN COMMUNICATIONS PROVIDERS AND POWER COMPANIES.**

Most commenters appear to agree that specific Commission action is not necessary and that it might make things worse. For example, AT&T stated: “Significant work is ongoing to further improve this collaboration.... The Commission would likely hamper (rather than improve) network resiliency by establishing new and/or duplicative procedures related to commercial power outages.”<sup>18</sup> T-Mobile commented: “Although information regarding the service restoration strategies of power companies in the wake of a disaster would facilitate the restoration of wireless

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<sup>14</sup> T-Mobile Comments at 5.

<sup>15</sup> Initial Comments at 11.

<sup>16</sup> See, e.g., CCA Comments at 5 (“Carriers know best how to harden and recover their own networks to maximize capabilities before and immediately after a catastrophic event.”); AT&T Comments at 6 (“The Commission would likely hamper (rather than improve) network resiliency by establishing new and/or duplicative procedures related to commercial power outages.”)

<sup>17</sup> See Initial Comments at 16-17.

<sup>18</sup> AT&T Comments at 6.

networks impacted by the same event, prescriptive requirements are unnecessary at this time.”<sup>19</sup> NCTA similarly explained: “while there is room for improvement in the coordination that takes place between communications providers and power companies, there is no need for the Commission to take action at this time. . . .”<sup>20</sup>

Though no commenter urges the Commission to take any particular action, the ACA claims: “it can be hard, particularly for smaller communications providers, to find the right personnel within [investor-owned power companies] to deal with at various stages of the recovery process.”<sup>21</sup> To this end, ACA suggests that “power companies should be expected to identify appropriate points of contact and share these with communications providers.”<sup>22</sup> AEP and Southern do not object to designating a point of contact for purposes of disaster recovery coordination. In fact, the AEP and Southern operating companies already do this in the local EOCs. But, as AEP and Southern explained in their initial comments, coordinating with multiple communications providers in an area affected by a disaster can be unwieldy and inefficient—especially given that the communications providers may have different or conflicting objectives.<sup>23</sup> To this end, communications providers should be expected to coordinate among themselves and designate a single point of contact to facilitate coordination efforts with power companies and government officials.<sup>24</sup>

Some commenters also seem to believe that they are not receiving information from power companies about their restoration priorities/efforts. For example, NCTA says that one of the biggest impediments to prompt network restoration for cable operators is a “lack of communication

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<sup>19</sup> T-Mobile Comments at 7.

<sup>20</sup> NCTA Comments at 1.

<sup>21</sup> ACA Comments at 11.

<sup>22</sup> ACA Comments at 11-12.

<sup>23</sup> Initial Comments at 9-10.

<sup>24</sup> Initial Comments at 9-10.

regarding a power company's priorities after an outage occurs.”<sup>25</sup> T-Mobile posits that its “restoration efforts could be significantly improved if it had better information regarding the plans and timetables for restoring commercial power.”<sup>26</sup> However, as mentioned above and in their initial comments, both AEP and Southern post information and updates to their respective websites that identify where there are outages and when electric service is expected to be restored in those areas. This information is made available to all electric customers, including communications providers. Additionally, real-time, on the ground information can be acquired through more robust EOC level participation.

### CONCLUSION

AEP and Southern appreciate the opportunity to submit these reply comments and look forward to further dialogue with the Commission on these important issues.

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<sup>25</sup> NCTA Comments at 2.

<sup>26</sup> T-Mobile Comments at 5.